



August 24, 2023

**TRANSMITTED ELECTRONICALLY**

Kareem Maine  
Plant Director  
Ultium Cells, LLC  
7400 Tod Ave SW  
Warren, OH 44481

**RE:   Ultium Cells LLC  
Notice of Violation (NOV)  
Air Permit  
Trumbull County  
0278112018  
Division of Air Pollution Control (DAPC)**

Dear Mr. Maine:

Thank you for submitting information in regards to Ultium Cells LLC in Warren, Ohio. This information was reviewed to determine your facility's compliance with Ohio's Air Pollution Control laws as found in Chapter 3704 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and the terms and conditions of Ultium Cells, LLC's permit-to-install (PTI) P0131268 issued on December 13, 2021.

**Findings**

Ohio EPA observed the following violations of Ohio's Air Pollution Control laws and Ultium Cells, LLC's permit terms and conditions. In order to bring your facility into compliance, we recommend promptly addressing these violations as soon as possible.

On April 24, 2023, the Ohio EPA DAPC issued a stack test extension letter requiring Ultium Cells, LLC to conduct emissions testing on emissions units P001: Solvent Recovery Plant and P003: Formation Degas by July 29, 2023. The emissions testing was scheduled to be conducted on June 21, 2023.

During the initial setup for the June 21, 2023 emissions testing on P003, inlet concentrations of total organic compounds and outlet concentrations of total organic compounds indicated that the required control efficiency of the activated carbon tower was not being achieved.

Per stack testing conducted on July 13, 2023, a rental combustion unit is currently destroying volatile organic compound (VOC) emissions from P003 at 74.2% efficiency. However, a long-term corrective action has not yet been identified.

P003's activated carbon tower's failure to meet the required 98% overall control efficiency for VOCs is a violation of ORC Section 3704.05(C), OAC rule 3745-31-05(E) and PTI P0131268 Section C.5.c)(1).

### **Conclusion**

The Ohio EPA requests that Ultium Cells, LLC promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. **Within 14 days of receipt of this letter**, please provide a corrective action plan to Ohio EPA detailing the actions that will be taken to resolve the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically by email to the email address below.

In the meantime, please continue to operate the rental combustion unit on P003.

Failure to comply with ORC Chapter 3704 and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, Ultium Cells LLC is requested to submit written correspondence describing the steps that will be taken to attain compliance.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in ORC 3704.06.

KAREEM MAINE  
ULTIUM CELLS, LLC  
AUGUST 24, 2023  
PAGE 3 OF 3

Should you have any questions, please contact me at (330) 963-1239, or by e-mail at [andrew.marantides@epa.ohio.gov](mailto:andrew.marantides@epa.ohio.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Marantides".

Andrew Marantides  
Environmental Specialist  
Division of Air Pollution Control

AM/af

cc: Nura Aden, Environmental Engineer, Ultium Cells, LLC  
Jessica Jeffery, Staff Environmental Engineer, GM  
Bob Hodanbosi, Chief, Ohio EPA, DAPC  
Zachary Peterson, Ohio EPA, Central Office, DAPC  
Josh Koch, Ohio EPA, Central Office, DAPC  
Corey Kurjian, Supervisor, Ohio EPA, NEDO, DAPC  
Tim Fischer, Manager, Ohio EPA, NEDO, DAPC  
Brian Dickens, U.S. EPA, Region V